

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Evergy)
Kansas Central, Inc. and Evergy Kansas)
South, Inc. Filing Tariff Revisions to its) Docket No. 21-EKCE-308-TAR
Transmission Delivery Charge)

PETITION

COMES NOW, Unified School District #259 Sedgwick County, Kansas (hereinafter “USD 259”) and respectfully petitions the Corporation Commission of the State of Kansas (the “Commission”) for an order permitting its intervention and full participation in the captioned proceeding. In support of its Petition, USD 259 states:

I. Background,

1. On February 23, 2021, Evergy Kansas Central Inc. and Evergy Kansas South, Inc. dba Evergy Kansas Central (hereinafter “Evergy”) filed the captioned Application to Make Revision to its Transmission Delivery Charge (TDC).

2. Evergy’s Application makes clear its request to substantially increase its TDC charges effective April 1, 2021.

II. Petition to Intervene

3. USD 259 comprises the Wichita Public Scholl system and is the largest public school system and district in the state of Kansas, serving approximately 51,000 students.

4. For year 2019, USD 259 consumed approximately 80,649,532 kWh of electricity supplied principally by Evergy at a cost of \$7,931,867.00.

5. USD 259 is part of the public schools rate class and is the largest school district in the state of Kansas. It appears that no other customer taking electric service under the public

schools rate class has intervened or sought to intervene in this Docket to date. Therefore, no other party can adequately represent the unique interests of USD 259 in these proceedings.

6. USD 259 is dependent primarily upon tax revenues to finance its mandated purpose of providing a quality education for Kansas students. The results of this docket could significantly impact future electric rates which public schools in Kansas, including USD 259, pay for electric power. Thus USD 259 has a vital interest which is a subject of this docket and its conclusions.

7. USD 259 requests the right to participate in all aspects of this Docket. The interests of justice will be served and the orderly and prompt conduct of these proceedings will not be impaired by allowing the intervention of USD 259 to participate therein.

8. In addition to the undersigned counsel, please include the following USD 259 representatives with all electronic notices, pleadings, and correspondence regarding this Application:

Dan Lawrence
General Counsel — USD 259
903 South Edgemoor, Room 113
Wichita, KS 67218
dlawrence@usd259.net

WHEREFORE, USD 259 respectfully requests that the Commission enter an order granting it full participation in the captioned proceedings.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

By 


Timothy E. McKee, #07135
temckee@twgfirm.com
2959 North Rock Road, Suite 300
Wichita, Kansas 67226

Attorneys for USD 259

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

I, Daniel E. Lawrence, of lawful age, being first duly sworn, upon oath states: I am General Counsel for USD 259, and I have read the above Petition to Intervene and know the contents and know that the statements made therein are true and correct, to the best of my knowledge and belief.


Printed Name: DAN LAWRENCE
Date: 2021-3-10

SUBSCRIBED AND SWORN to before me on this 10th day of March, 2021.


Notary Public

My Commission Expires: April 16, 2021



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 10th day of March, 2021, to the following:

Robin Allacher, Regulatory Analyst
Evergy Kansas Central, Inc
818 S Kansas Ave
PO Box 889
Topeka, KS 66601-0889
robin.allacher@evergy.com

Ronald A. Klote, Director Regulatory Affairs
Evergy Kansas Central, Inc
818 S Kansas Ave
PO Box 889
Topeka, KS 66601-0889
ronald.klote@evergy.com

Lisa Starkebaum, Manager, Regulatory Affairs
Evergy Metro, Inc.
d/b/a Evergy Kansas Metro
One Kansas City Place
1200 Main St, 19th Floor
Kansas City, MO 64105
Fax: 816-556-2110
lisa.starkebaum@evergy.com

Darrin R. Ives, W.P. Regulatory Affairs
Evergy Metro, Inc
d/b/a Evergy Kansas Metro
One Kansas City Place
1200 Main St., 19th Floor
Kansas City, MO 64105
Fax: 816-556-2110
darrin.ives@evergy.com

Carly Masenthin, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604
c.masenthin@kcc.ks.gov

Joseph R. Astrab, Attorney
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
j.astrab@curb.kansas.gov

Todd E. Love, Attorney
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
t.love@curb.kansas.gov

David W. Nickel, Consumer Counsel
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
D.NICKEL@CURB.KANSAS.GOV

Shonda Rabb
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
s.rabb@curb.kansas.gov

Della Smith
Citizens' Utility Ratepayer Board
1500 SW Arrowhead Rd
Topeka, KS 66604
d.smith@curb.kansas.gov

Daniel E. Lawrence, General Counsel
Unified School District 259
903 S. Edgemoor, Room 113
Wichita, KS 67218
dlawrence@usd259.net



Timothy E. McKee, #07135